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Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals

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Item 3 (c) of the provisional agenda
Hazard communication issues: Miscellaneous

Application of precautionary statement P502 to explosives

Transmitted by the expert from Sweden[1]

Background

1. In the discussion paper INF. 18 submitted to the 25th session of the Sub-Committee, Sweden pointed to the problems of applying precautionary statement P501 to pyrotechnic articles supplied to the general public. P501, which reads "Dispose of contents/container to ..." is the only precautionary statement prescribed for explosives according to Table A3.2.5 in Section 2 of Annex 3 in the GHS.

Problem

2. As further explained in the previous paper from Sweden, P501 is not well-suited for explosives, since:

(a) for functioning explosives there are no contents and usually also no container left after use, and

[1] In accordance with the programme of work of the Sub-Committee for 2015-2016 approved by the Committee at its seventh session (refer to ST/SG/AC.10/C.4/56, annex III and ST/SG/AC.10/42, para. 15).

(b) for malfunctioning or non-used explosives special care is needed and no "normal" chemicals disposal, such as disposal at an environmental station, is advisable or even allowed.

3. The concern is particularly large for explosive articles that are supplied to the general public, such as fireworks, signal flares and ammunition. It is important that this audience receives clear instructions on how to dispose of such products – in particular when it comes to products that have malfunctioned, have expired or for some other reason have not been used. Ill-formulated advice on the label may lead to the disposal of such explosive waste in a way that poses a risk e.g. to the workers that handle the waste.

Proposal

4. The only other currently available precautionary statement for disposal in the GHS is P502, which reads "Refer to manufacturer/supplier for information on recovery/recycling.". It is currently only applicable to substances/mixtures that are classified as hazardous to the ozone layer (see Table A3.2.5 in the GHS).

5. P502 seems in most, if not all, cases to be more suitable than P501 for explosives disposal, and there is no reason this precautionary statement could not be used for more hazard classes than hazardous to the ozone layer. Malfunctioning, expired or non-used explosives handled by the general public, such as fireworks, signal flares and ammunition, should normally be returned to the supplier for proper destruction. P502 could then be formulated: "Refer to supplier for information on recovery.". For other types of explosives, referral to the manufacturer may be more suitable.

6. It is therefore proposed to prescribe the use of P502 for explosives in addition to P501 (option A) or instead of P501 (option B). Necessary amendments to the GHS to accomplish both these options are shown below.

7. Since malfunctioning and expired explosives are often not recovered or recycled but rather destroyed, it may be considered to add "disposal" to the options of phrasing P502 so that it reads "Refer to manufacturer/supplier for information on recovery/recycling/disposal." This would then automatically become an option also for the hazard class hazardous to the ozone layer, which does not appear to be problematic.

Option A: Apply P502 for explosives (in addition to P501)

In Annex 3, Section 2, Table A3.2.5, for P502, insert a new row for the hazard class "Explosives (chapter 2.1)", hazard categories "Unstable explosives and Divisions 1.1, 1.2, 1.3, 1.4, 1.5", as follows.

Code (1)	Disposal precautionary statements (2)	Hazard class (3)	Hazard category (4)	Conditions for use (5)
P502	Refer to manufacturer/supplier for information on recovery/recycling	**Explosives (chapter 2.1)**	**Unstable explosives and Divisions 1.1, 1.2, 1.3, 1.4, 1.5**	
		Hazardous to the ozone layer (chapter 4.2)	1	

Option B: Exchange P501 for P502 for explosives

In Annex 3, Section 2, Table A3.2.5:

- For **P502**: insert a new row for the hazard class "Explosives (chapter 2.1)", hazard categories "Unstable explosives and Divisions 1.1, 1.2, 1.3, 1.4, 1.5", as follows:

Code (1)	Disposal precautionary statements (2)	Hazard class (3)	Hazard category (4)	Conditions for use (5)
P502	Refer to manufacturer/supplier for information on recovery/recycling	**Explosives (chapter 2.1)**	**Unstable explosives and Divisions 1.1, 1.2, 1.3, 1.4, 1.5**	
		Hazardous to the ozone layer (chapter 4.2)	1	

- For **P501**: delete the row for the hazard class "Explosives (chapter 2.1)", hazard categories "Unstable explosives and Divisions 1.1, 1.2, 1.3, 1.4, 1.5", as follows:

Code (1)	Disposal precautionary statements (2)	Hazard class (3)	Hazard category (4)	Conditions for use (5)
P501	Dispose of contents/container to...	~~**Explosives (chapter 2.1)**~~	~~**Unstable explosives and Divisions 1.1, 1.2, 1.3, 1.4, 1.5**~~	*[unchanged]*
		[Remainder of the table: unchanged]		

Additional option C: Add "disposal" to the text of P502

Add "disposal" to the text of P502 in Table A3.2.5 (applicable to options A and B), as follows:

"Refer to manufacturer/supplier for information on recovery/recycling**/disposal**."

Consequential amendments

In Annex 3, section 3, matrix tables in A3.3.5, amend the disposal precautionary statements in line with the adoption of option A or B, and additional option C.